

# **Exhibit 3**

## **Omnibus Mao Declaration**

**MATERIALS SOUGHT TO  
BE FILED UNDER SEAL**

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GOOGLE LLC

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO**

ANIBAL RODRIGUEZ AND JULIE ANNA  
MUNIZ, individually and on behalf of all other  
similarly situated,

Plaintiff,

vs.

GOOGLE LLC, *et al.*,

Defendant.

Case No. 3:20-CV-04688

**DEFENDANT GOOGLE LLC’S  
SECOND SUPPLEMENTAL  
RESPONSES AND OBJECTIONS TO  
PLAINTIFFS’ INTERROGATORIES,  
SET ONE**

Judge: Hon. Richard Seeborg  
Courtroom: 3, 17th Floor  
Action Filed: July 14, 2020

PROPOUNDING PARTY: PLAINTIFFS ANIBAL RODRIGUEZ AND JULIEANNA MUNIZ

RESPONDING PARTY: DEFENDANT GOOGLE LLC

SET NO.: ONE

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1 Google’s customers are likewise never given access to data that could be used to de-anonymize  
2 users.

3 Plaintiffs’ First Amended Complaint cites and quotes public documentation about GA for  
4 Firebase to demonstrate the types of user app interaction data, or “event data” that Plaintiffs allege  
5 Google is improperly collecting. In order for the data collection described in each of those pieces  
6 of documentation to occur, an app developer must enable GA for Firebase. If app developers don’t  
7 enable GA for Firebase, the data that would otherwise be sent to Google servers by GA for  
8 Firebase isn’t sent to Google servers. Google doesn’t implement in Firebase SDK any “shadow”  
9 copy of GA for Firebase that operates regardless of whether a developer has enabled GA for  
10 Firebase, nor does Google has any “secret scripts” that ignore the consent settings of users in order  
11 to connect event data to specific users’ profiles. GA for Firebase will not store event data  
12 connected to a specific user’s profile unless the app has permitted it and a user has opted into  
13 certain features, namely: the supplemental checkbox under the WAA control (sWAA), which can  
14 only be turned on if WAA is also turned on; Google Ads Personalization (GAP); and the  
15 supplemental checkbox under the GAP control (NAC). Finally, based on a reasonable  
16 investigation, Google has been unable to identify any impact an app's decision to use or not use a  
17 Google product or service other than Firebase SDK would have on the functioning of GA for  
18 Firebase as described below.

19 With regard to the other products and features that are part of Firebase SDK that may  
20 collect overlapping pieces of data, such as device model, app updates, and other types of data,  
21 such functionality is publicly documented including on Google’s public help center pages at  
22 GOOG-RDGZ-00013288 - GOOG-RDGZ-00013449, which can also be viewed at  
23 firebase.google.com and support.google.com.

**INTERROGATORY NO. 2:**

25 Please identify every app that includes or has included Google’s Firebase SDK since the  
26 start of the Class Period, including for each app the time period during which that app used  
27 Google’s Firebase SDK and Google therefore would have received data even when users had Web  
28

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1 & App Activity turned off (or previously paused).

2 **RESPONSE TO INTERROGATORY NO. 2:**

3 Google objects to Interrogatory No. 2 as vague and ambiguous as to the undefined term  
4 “Web & App Activity.” For purposes of this response, Google construes Web & App Activity to  
5 mean the account-level setting called Web & App Activity. Google further objects to this  
6 Interrogatory as vague and ambiguous with respect to the phrases “Google therefore would have  
7 received the data” and “Firebase SDK.” Google further objects that the definition of “Class  
8 Period” is vague and ambiguous, as the Interrogatories define the term to mean “the class period  
9 in this case, as defined in the operative complaint,” when the “operative complaint” has changed  
10 between when the Interrogatories were served and when these responses were provided, and the  
11 definition of “Class Period” differs between the original and amended complaints. Google further  
12 objects that the term “Class Period” is vague and ambiguous because it fails to provide a concrete  
13 range of time. Google further objects to this Interrogatory to the extent that it seeks information  
14 protected by the attorney-client privilege and/or the attorney work product doctrine. Google  
15 further objects to this Interrogatory because it is unduly burdensome, overbroad, and  
16 disproportionate to the needs of the Action, as it seeks a list of every app that includes or has  
17 included “Google Firebase SDK” since the start of the “Class Period,” which may have little to no  
18 bearing on Plaintiffs’ claims. Google objects that this request is incomprehensible and unduly  
19 burdensome to the extent it seeks information from the time periods during which an  
20 undifferentiated set of users had WAA turned off and were using an app that utilized Firebase  
21 SDK.

22 **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 2:**

23 Subject to and without waiving the foregoing, Google responds as follows: Google has  
24 conducted a reasonably diligent search to determine which Android apps of the ones identified in  
25 Plaintiffs’ First Amended Complaint (FAC ¶¶ 207, 209, 211, 213, 215, 217, 219, 221, 223) have  
26 had Google Analytics for Firebase enabled. There are several complications to keep in mind with  
27 such data. First, app developers may give their users granular control over whether Google

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Analytics for Firebase is enabled on that app, and that could be turned on and off at any given moment by a user. Second, an app developer may show as having Google Analytics for Firebase turned on, but not actually be using it to transmit any data. Third, even if an app developer has used Google Analytics for Firebase in the past, that does not mean that it is currently using it. Finally, Google’s investigation is current as of this week.

Subject to the foregoing caveats, Google has been able to determine that the following Android apps have had Google Analytics for Firebase enabled:

- |   |                            |
|---|----------------------------|
| • ABC                                     | • B. Good                  |
| • Accuweather                             | • Baseball Superstars 2020 |
| • Acorns                                  | • Baskin Robbins           |
| • Acrobat Reader                          | • BBC America              |
| • Alarm Clock for Me                      | • Best Buy                 |
| • Alibaba                                 | • Better Help              |
| • Ali Express                             | • Bible                    |
| • All Trails                              | • Bixby Vision             |
| • Amazon Prime Video                      | • BluHop                   |
| • American Airlines                       | • Bodies by Rachel         |
| • Angie’s List                            | • Booking.com              |
| • Apple Music                             | • Bruster’s                |
| • Applebee’s                              | • California Lottery       |
| • Aqua Mail                               | • Call of Duty             |
| • Atmosphere                              | • Calm                     |
| • Audio Recorder                          | • Candy Crush              |
| • Auntie Anne’s                           | • Candy Crush Saga         |
| • Avast Cleanup                           | • Canva                    |
| • Avast Antivirus – Scan &<br>RemoveVirus | • Cardiogram               |
|   | • CBS                      |

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- |    |                       |                             |
|----|-----------------------|-----------------------------|
| 1  | • CBS Sports          | • eBay                      |
| 2  | • Chewy               | • Ecobee                    |
| 3  | • Chick-fil-A         | • Einstein Bros Bagels      |
| 4  | • Chili’s             | • EMAY Portable ECG Monitor |
| 5  | • ClassDojo           | • Emergency Alerts          |
| 6  | • Clawee              | • Epocrates                 |
| 7  | • Cleaner             | • ESPN                      |
| 8  | • Coffee Bean         | • ESPN Fantasy              |
| 9  | • Cooking Fever       | • Etsy                      |
| 10 | • Coursera            | • Evite                     |
| 11 | • Craigslist          | • Facebook                  |
| 12 | • Cricket Partner Tab | • Facebook Lite             |
| 13 | • Current             | • Facebook Messenger        |
| 14 | • Dad Jokes           | • Fair                      |
| 15 | • Daily Mail Online   | • Faire                     |
| 16 | • Dairy Queen         | • FastSave                  |
| 17 | • Dillon’s            | • File Viewer for Android   |
| 18 | • Discord             | • Firehouse Subs            |
| 19 | • Dogo                | • Fly Delta                 |
| 20 | • Dollar General      | • Frontpoint                |
| 21 | • Domino’s            | • FuboTV                    |
| 22 | • DoorDash            | • Fulldive VR               |
| 23 | • Dosh                | • Fundrise                  |
| 24 | • Dropbox             | • Gallery                   |
| 25 | • Duo                 | • Game Launcher             |
| 26 | • Duolingo            | • Gametime                  |
| 27 | • E*Trade             | • Gangstar 4                |

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

- |    |                     |                           |
|----|---------------------|---------------------------|
| 1  | • GIPHY             | • Key Ring                |
| 2  | • Glassdoor         | • Kinecta FCU             |
| 3  | • Gold Fish         | • Lasting                 |
| 4  | • GoMLS miami       | • Later                   |
| 5  | • Good on You       | • LinkedIn                |
| 6  | • GoodRx            | • Little Caesars          |
| 7  | • GoodRx Pro        | • Lyft                    |
| 8  | • Goodtime          | • Macy’s                  |
| 9  | • Google            | • MapMyRide               |
| 10 | • GoToWebinar       | • Marcus                  |
| 11 | • Groupon           | • McDonald’s              |
| 12 | • Grubhub           | • Messenger               |
| 13 | • HBOMax            | • Microsoft Authenticator |
| 14 | • Headspace         | • Military Star Mobile    |
| 15 | • Home Depot        | • MixerBox                |
| 16 | • Hulu              | • MX Player               |
| 17 | • Identity Force    | • myCigna                 |
| 18 | • IHG               | • myCricket               |
| 19 | • Imprivata ID      | • MyFitnessPal            |
| 20 | • Indeed Job Search | • MySchoolBucks           |
| 21 | • Instacart         | • Nest                    |
| 22 | • Instagram         | • Netflix                 |
| 23 | • Instagram Repost  | • News Break              |
| 24 | • Jackpot Party     | • Nextdoor                |
| 25 | • Jaybird           | • NFL                     |
| 26 | • Jetpack           | • Ninja’s Creed           |
| 27 | • Jimmy John’s      | • Ninja's Creed           |

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

- |    |                                     |                                |
|----|-------------------------------------|--------------------------------|
| 1  | • Nintendo Switch Parental Controls | • RaceTrac                     |
| 2  | • NMB                               | • RAR                          |
| 3  | • Noom                              | • Realtor.com                  |
| 4  | • NPR One                           | • Redbox                       |
| 5  | • NPR News                          | • Reddit                       |
| 6  | • OfferUp                           | • Relay for Reddit             |
| 7  | • OpenTable                         | • Revolve                      |
| 8  | • Outlook                           | • Ring                         |
| 9  | • ParkMobile                        | • Robinhood                    |
| 10 | • PayByPhone                        | • Roblox                       |
| 11 | • PayPal                            | • Rover                        |
| 12 | • PDK Touch                         | • Samsung Internet             |
| 13 | • Peet’s                            | • Samsung Member               |
| 14 | • PetDesk                           | • Samsung Notes                |
| 15 | • PicCollage                        | • Samsung Print Service Plugin |
| 16 | • Pinterest                         | • Scam Shield                  |
| 17 | • Pizza Hut                         | • Scanner App: PDF Document    |
| 18 | • Pocket                            | Scan                           |
| 19 | • Pocket Casts                      | • Scrabble                     |
| 20 | • Pokerrr2                          | • SeatGeek                     |
| 21 | • Pollo Tropical                    | • Sezzle                       |
| 22 | • Pomodoro                          | • SharkTracker – OCEARCH       |
| 23 | • Postmates                         | • Shazam                       |
| 24 | • Premier League                    | • Shutterfly Share Site        |
| 25 | • Publix                            | • Skillshare                   |
| 26 | • Publix Instacart                  | • Slack                        |
| 27 | • Puppr                             | • Sleep Cycle                  |



**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

- |    |                          |                       |
|----|--------------------------|-----------------------|
| 1  | • Sleep Sounds           | • The New York Times  |
| 2  | • Slingshot Stunt Driver | • The Athletic        |
| 3  | • SmartNews              | • The Grand Mafia     |
| 4  | • SmartWorld             | • The RealReal        |
| 5  | • Smule                  | • TheSCOOP            |
| 6  | • Solitaire              | • TheScore            |
| 7  | • Sonos S1               | • The Weather Channel |
| 8  | • SOPlayer               | • Think Dirty         |
| 9  | • SoundCloud             | • Ticketmaster        |
| 10 | • Spotify                | • TikTok              |
| 11 | • Square Pic             | • Tiles Hop           |
| 12 | • Sricam                 | • Tiny Scanner        |
| 13 | • Stack Colors           | • T-Mobile            |
| 14 | • Starbucks              | • T-Mobile Tuesdays   |
| 15 | • Stash                  | • Travelzoo           |
| 16 | • Steam                  | • Trip.com            |
| 17 | • Strava                 | • Trivago             |
| 18 | • StubHub                | • Truebill            |
| 19 | • SunPass                | • Tuner-Pitched       |
| 20 | • Surfline               | • Turbo               |
| 21 | • Sweatcoin              | • Twitter             |
| 22 | • Talon                  | • Uber                |
| 23 | • Target                 | • Uber Eats           |
| 24 | • Target                 | • Udemy               |
| 25 | • Tender Greens          | • UpToDate            |
| 26 | • Tesla                  | • USAA                |
| 27 | • The Economist          | • USPS Mobile         |

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

- |    |              |                        |
|----|--------------|------------------------|
| 1  | • Venmo      | • Xfinity              |
| 2  | • Viber      | • Xfinity Mobile       |
| 3  | • Vivino     | • Xfinity My Account   |
| 4  | • Walgreens  | • Yahoo Mail           |
| 5  | • WalletHub  | • Yelp                 |
| 6  | • Walmart    | • Yoga Down Dog        |
| 7  | • Wattpad    | • Your Phone Companion |
| 8  | • Waze       | • Zappos               |
| 9  | • WhatsApp   | • Zelle                |
| 10 | • WHOOP      | • Zillow               |
| 11 | • WikiEM     | • ZipRecruiter         |
| 12 | • Wish       | • Zoho Mail            |
| 13 | • WordPress  | • Zoom                 |
| 14 | • Wordscapes |                        |

Subject to the foregoing caveats, Google has been able to determine that the following Android apps have not had Google Analytics for Firebase enabled:

- |    |                               |                     |
|----|-------------------------------|---------------------|
| 17 | • A to Z ECG Interpretation   | • Burger King       |
| 18 | • Amazon Music                | • Cash App          |
| 19 | • Amazon Shopping             | • Chill             |
| 20 | • Among Us                    | • Chrome            |
| 21 | • App Installer               | • Clinicals         |
| 22 | • Apple TV                    | • Clock             |
| 23 | • Atmosphere Binaural Therapy | • Digital Wellbeing |
| 24 | • Audible                     | • Disney Plus       |
| 25 | • Barcode Scanner             | • Docs              |
| 26 | • Bleacher Report             | • Drive             |
| 27 | • Boxer                       | • DroidCam          |

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

- |    |                         |                             |
|----|-------------------------|-----------------------------|
| 1  | • Ecosia                | • Preview                   |
| 2  | • EECU                  | • ProtonMail                |
| 3  | • ES File Explorer      | • QR Reader                 |
| 4  | • Essential Oils & More | • QuickMemo+                |
| 5  | • Fire TV               | • Retro Bowl                |
| 6  | • Galaxy Themes         | • Samsung Gallery           |
| 7  | • Hangouts              | • Samsung Pay               |
| 8  | • Harrison’s Manual     | • Samsung voice input       |
| 9  | • Ibotta                | • Screen Filter             |
| 10 | • IMDB                  | • ShareWaste                |
| 11 | • Instant Save          | • Shopify                   |
| 12 | • Kindle                | • Shopify POS               |
| 13 | • Lawnchair             | • Signal                    |
| 14 | • Layout                | • SIM Toolkit               |
| 15 | • Letgo                 | • Sketch Photo              |
| 16 | • Menchie’s             | • Smart Switch              |
| 17 | • Messenger Kids        | • Smokeball                 |
| 18 | • Microsoft Word        | • Snapchat                  |
| 19 | • Mobile Service        | • Snellen Chart             |
| 20 | • myAT&T                | • Sprouts                   |
| 21 | • NCCN Guidelines       | • Square Point of Sale      |
| 22 | • Nike Run Club         | • Stickman Parkour Platform |
| 23 | • Oak                   | • Textra                    |
| 24 | • Pandora               | • Time Zone Updater         |
| 25 | • PetPage               | • Verizon Voicemail         |
| 26 | • Pi Music Player       | • VeSyncFit                 |
| 27 | • Ping                  | • Voice Recorder            |

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- Whole Foods
- Wikipedia
- Yahoo Fantasy
- Zen Planner

Google’s investigation is ongoing. Google can investigate iOS apps as well if Plaintiffs can identify which of the apps identified in the First Amended Complaint were used by Plaintiffs on iOS devices.

**SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 2:**

Subject to and without waiving the foregoing, Google responds as follows: Google has conducted a reasonably diligent search to determine which iOS apps of the ones identified in Plaintiffs’ First Amended Complaint (FAC ¶¶ 207, 215, 217) have had Google Analytics for Firebase enabled. As with Google’s investigation into the Android apps, there are several complications to keep in mind with such data. First, app developers may give their users granular control over whether Google Analytics for Firebase is enabled on that app, and that could be turned on and off at any given moment by a user. Second, an app developer may show as having Google Analytics for Firebase turned on, but not actually be using it to transmit any data. Third, even if an app developer has used Google Analytics for Firebase in the past, that does not mean that it is currently using it. Finally, Google’s investigation is current as of May 23, 2021.

Subject to the foregoing caveats, Google has been able to determine that the following iOS apps have had Google Analytics for Firebase enabled:

- |                      |                          |
|----------------------|--------------------------|
| • Acorns             | • B. Good                |
| • Alarm Clock for Me | • BaseballSuperstars2020 |
| • Alibaba            | • BBC America            |
| • AliExpress         | • BestBuy                |
| • AllTrails          | • Bible                  |
| • Angie’s List       | • Bodies by Rachel       |
| • Applebee’s         | • Booking.com            |
| • Auntie Anne’s      | • Burger King            |
| • Avast Cleanup      | • California Lottery     |

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

- |    |                     |                        |
|----|---------------------|------------------------|
| 1  | • Call of Duty      | • Duolingo             |
| 2  | • Calm              | • E*Trade              |
| 3  | • Canva             | • eBay                 |
| 4  | • Cardiogram        | • Ecobee               |
| 5  | • Cash App          | • Einstein Bros Bagels |
| 6  | • CBS Sports        | • EMAY Portable ECG    |
| 7  | • Chewy             | Monitor                |
| 8  | • Chili’s           | • Emergency Alerts     |
| 9  | • Chill             | • Epocrates            |
| 10 | • Chrome            | • ESPN Fantasy         |
| 11 | • ClassDojo         | • Evite                |
| 12 | • Clawee            | • Facebook             |
| 13 | • Coffee Bean       | • Facebook Messenger   |
| 14 | • Cooking Fever     | • Fair                 |
| 15 | • Coursera          | • Faire                |
| 16 | • Dad Jokes         | • Firehouse Subs       |
| 17 | • Daily Mail Online | • Frontpoint           |
| 18 | • Dairy Queen       | • FuboTV               |
| 19 | • Dillon’s          | • Fulldive VR          |
| 20 | • Discord           | • Fundrise             |
| 21 | • Dogo              | • Gametime             |
| 22 | • Dollar General    | • Gangstar 4           |
| 23 | • Domino’s          | • GIPHY                |
| 24 | • DoorDash          | • Glassdoor            |
| 25 | • Dosh              | • GoldFish             |
| 26 | • Dropbox           | • GoMLSmiami           |
| 27 | • Duo               | • Good On You          |

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

- |    |                     |                            |
|----|---------------------|----------------------------|
| 1  | • GoodRx Pro        | • Military Star Mobile     |
| 2  | • Google            | • MixerBox                 |
| 3  | • GoToWebinar       | • MX Player                |
| 4  | • Groupon           | • My Verizon               |
| 5  | • Grubhub           | • myCigna                  |
| 6  | • Harrison’s Manual | • myCricket                |
| 7  | • Headspace         | • MyFitnessPal             |
| 8  | • Home Depot        | • MySchoolBucks            |
| 9  | • IdentityForce     | • Nest                     |
| 10 | • Indeed Job Search | • News Break               |
| 11 | • Instacart         | • Nextdoor                 |
| 12 | • Instagram         | • NFL                      |
| 13 | • Jackpot Party     | • Ninja’s Creed            |
| 14 | • Jaybird           | • Nintendo Switch Parental |
| 15 | • Jetpack           | Controls                   |
| 16 | • JimmyJohn’s       | • NMB                      |
| 17 | • Key Ring          | • Noom                     |
| 18 | • Kinecta FCU       | • NPR News                 |
| 19 | • Lasting           | • NPR One                  |
| 20 | • Later             | • Oak                      |
| 21 | • Letgo             | • OCEARCH – Shark Tracker  |
| 22 | • Little Caesars    | • OfferUp                  |
| 23 | • Map My Ride       | • OpenTable                |
| 24 | • Marcus            | • ParkMobile               |
| 25 | • McDonald’s        | • PayByPhone               |
| 26 | • Menchie’s         | • PayPal                   |
| 27 | • Messenger         | • pdk touch                |

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

- |                             |                          |
|-----------------------------|--------------------------|
| • Peet’s                    | • SeatGeek               |
| • PetDesk                   | • Sezzle                 |
| • PicCollage                | • Shazam                 |
| • Ping                      | • Shutterfly Share Sites |
| • Pinterest                 | • Skillshare             |
| • Pizza Hut                 | • Slack                  |
| • Pocket                    | • Sleep Cycle            |
| • Pocket Casts              | • Slingshot Stunt Driver |
| • Pokerrr2                  | • Smart World            |
| • Pomodoro                  | • SmartNews              |
| • Postmates                 | • Smule                  |
| • Premier League            | • Solitaire              |
| • Publix                    | • Sonos S1               |
| • Puppr                     | • SoundCloud             |
| • QR Reader                 | • Spotify                |
| • RaceTrac                  | • Stack Colors           |
| • Realtor.com               | • Stash                  |
| • Redbox                    | • Strava                 |
| • Reddit                    | • StubHub                |
| • Repost for Instagram      | • SunPass                |
| • Revolve                   | • Surfline               |
| • Robinhood                 | • Sweatcoin              |
| • Rover                     | • Target                 |
| • Scam Shield               | • Tender Greens          |
| • Scanner App: PDF Document | • The Athletic           |
| • Scan                      | • The Economist          |
| • Scrabble                  | • The Grand Mafia        |

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

- |                       |                  |
|-----------------------|------------------|
| • The New York Times  | • USAA           |
| • The RealReal        | • USPS Mobile    |
| • The Weather Channel | • Venmo          |
| • theScore            | • Viber          |
| • Think Dirty         | • Vivino         |
| • Ticketmaster        | • Walgreens      |
| • TikTok              | • WalletHub      |
| • Tiles Hop           | • Walmart        |
| • TinyScanner         | • Wattpad        |
| • T-Mobile            | • Waze           |
| • T-Mobile Tuesdays   | • WHOOP          |
| • Travelzoo           | • WikiEM         |
| • Trip.com            | • Wish           |
| • Trivago             | • Wordscapes     |
| • Truebill            | • Xfinity        |
| • Tuner-Pitched       | • Xfinity Mobile |
| • Turbo               | • Yoga Down Dog  |
| • Twitter             | • Zappos         |
| • UberEats            | • Zelle          |
| • Udemy               | • Zillow         |
| • UpToDate            | • ZipRecruiter   |

Subject to the foregoing caveats, Google has been able to determine that the following iOS apps have not had Google Analytics for Firebase enabled:

- |                  |                      |
|------------------|----------------------|
| • ABC            | • Amazon Prime Video |
| • Accuweather    | • Amazon Shopping    |
| • Acrobat Reader | • American Airlines  |
| • Amazon Music   | • Among Us           |



**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

- |    |                               |                           |
|----|-------------------------------|---------------------------|
| 1  | • Apple Music                 | • Fastsave                |
| 2  | • Apple Podcasts              | • Fire TV                 |
| 3  | • Apple TV                    | • Fitness                 |
| 4  | • Atmosphere                  | • Fly Delta               |
| 5  | • Atmosphere Binaural Therapy | • GoodRx                  |
| 6  | • Audible                     | • Goodtime                |
| 7  | • Audio Recorder              | • Hangouts                |
| 8  | • Baskin-Robbins              | • HBO Max                 |
| 9  | • BetterHelp                  | • Hulu                    |
| 10 | • Bleacher Report             | • Ibotta                  |
| 11 | • BluHop                      | • IHG                     |
| 12 | • Boxer                       | • IMDB                    |
| 13 | • Bruster’s                   | • Imprivata ID            |
| 14 | • Candy Crush                 | • Instant Save            |
| 15 | • Candy Crush Saga            | • Kindle                  |
| 16 | • CBS                         | • Layout                  |
| 17 | • Chick-fil-A                 | • LinkedIn                |
| 18 | • Craigslist                  | • Lyft                    |
| 19 | • Disney+                     | • Macy’s                  |
| 20 | • Docs                        | • Messenger Kids          |
| 21 | • Drive                       | • Microsoft Authenticator |
| 22 | • DroidCam                    | • Microsoft Word          |
| 23 | • Ecosia                      | • Mobile Service          |
| 24 | • EECU                        | • myAT&T                  |
| 25 | • ES File Explorer            | • NCCN Guidelines         |
| 26 | • ESPN                        | • Netflix                 |
| 27 | • Etsy                        | • Nike Run Club           |

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

- Outlook
- Pandora
- PetPage
- Pollo Tropical
- Preview
- ProtonMail
- Quick Memo+
- RAR
- Retro Bowl
- Ring
- Roblox
- ShareWaste
- Shopify
- Shopify POS
- Signal
- Sleep Sounds
- SmartSwitch
- Smokeball
- Snapchat
- SoPlayer
- Sprouts
- Square Point of Sale
- Sricam
- Starbucks
- Steam
- Stickman Parkour Platform
- Stocks
- Stream
- Tesla
- Uber
- USPSTF
- VeSyncFit
- Voice Recorder
- WebView
- WhatsApp
- Whole Foods
- Wikipedia
- WordPress
- Xfinity My Account
- Yahoo Fantasy
- Yahoo Mail
- Yelp
- Zen Planner
- Zoho Mail
- Zoom

**HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**

1 that the search results returned to the user will show nearby restaurant options. When Web & App  
2 Activity is turned off, Google stops storing subsequent Web & App Activity in the user’s Google  
3 account.

4 **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 4:**

5 Subject to and without waiving the foregoing, Google responds further as follows:

6 The Web & App Activity control (WAA) in a user’s Google account has been available  
7 since before Google Analytics for Firebase launched. WAA has never controlled whether Google  
8 Analytics for Firebase collects and sends user activity data from third party apps to Google  
9 servers. At no point has Google represented that WAA would control whether Google Analytics  
10 for Firebase collects user activity data, and at no point has WAA saved the data from Google  
11 Analytics for Firebase to a user’s Google account. Because WAA has never controlled Google  
12 Analytics for Firebase, WAA and its particular development and change history is not relevant.

13  
14  
15 Dated: June 8, 2021

**WILLKIE FARR & GALLAGHER LLP**

16  
17 By: /s/ Benedict Y. Hur

Benedict Y. Hur

18 *Attorneys for Defendant Google LLC*  
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**PROOF OF SERVICE**

I am employed in the City and County of San Francisco, State of California. I am over the age of eighteen years and not a party to the within action. My business address is Willkie Farr & Gallagher LLP, One Front Street, San Francisco, CA 94111.

On June 8, 2021, I served the following document(s) on the individuals identified below:

- **DEFENDANT GOOGLE LLC'S SUPPLEMENTAL RESPONSES TO PLAINTIFFS' INTERROGATORIES, SET ONE**

- ☒ by **E-MAIL VIA PDF FILE**, by transmitting on this date via e-mail a true and correct copy scanned into an electronic file in Adobe "pdf" format. The transmission was reported as complete and without error.

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Executed on June 8, 2021 at San Francisco, California.

I declare under penalty of perjury under the laws of the United States that the above is true  
and correct.

/s/ Celeste Peifer  
Celeste Peifer